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1	FISHER & PHILLIPS LLP		
2	LISA A. MCCLANE, ESQ. Nevada Bar No. 10139 300 South Fourth Street, Suite 1500 Las Vegas, NV 89101 Telephone: (702) 252-3131		
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-	Facsimile: (702) 252-7411		
5	mcclane@fisherphillips.com		
6 7	Attorneys for Defendant Nevada Property 1, LLC, dba The Cosmopolitan of Las Vegas		
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10	PATRICK HEEGEL,) Case No.: 2:20-cv-00001-APG-BNW	
11	Plaintiff,)	
12	vs.	 STIPULATION AND ORDER TO EXTEND DISPOSITIVE MOTION DEADLINES 	
13	NEVADA PROPERTY 1 LLC, a) DEADLINES	
14	Delaware limited liability company, doing business as THE) (Third Request)	
15	COSMOPOLITAN OF LAS VEGAS,)	
16	Defendant.)	
17		_)	
18	IT IS HEREBY STIPULATED by and between Plaintiff Patrick Heeg		
19	("Plaintiff"), through his counsel the Law Offices of Robert P. Spretnak, and Defendar		
20	Nevada Property 1, LLC doing business as The Cosmopolitan of Las Vega		
21	("Defendant"), through its counsel Fisher & Phillips LLP, as follows:		
22	The current deadline to file dispositive motions (November 10, 2021), b		
23	extended thirty (33) days, to December 13, 2021. The extension is necessary because		
24	we are still awaiting a deposition transcript for a main witness. In addition, defens		

counsel has assumed the entire litigation caseload of another colleague due to

unforeseen circumstances which includes at least five depositions before Thanksgiving.

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1	This stipulation and order is sought in good faith and not for the purpose of delay.		
2	Dated this 8th day of November, 2021.		
3	LAW OFFICE OF ROBERT P. SPRETNAK	FISHER & PHILLIPS LLP	
4	/s/ Robert Spretnak	/s/ Lisa A. McClane	
5	Robert Spretnak, Bar No. 5135 8275 S. Eastern Avenue, Suite 200	Lisa A. McClane, Bar No. 10139 300 S. Fourth Street, Suite 900	
6	Las Vegas, Nevada 89123	Las Vegas, Nevada 89101	
7	Attorney for Plaintiff PATRICK HEEGEL	Attorneys for Defendant The Cosmopolitan of Las Vegas	
8			
9	<u>Order</u>		
10	IT IS ORDERED that ECF No. 48 is GRANTED. The		
11	deadline to file dispositive motions is extended to 12/13/2021. The parties are advised, however, that the Court does not intend to continue this deadline again, absent exceptional circumstances demonstrating good cause.		
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	IT IS SO ORDERED		
13	DATED: 1:32 pm, November 09, 2021		
14	BRENDA WEKSLER UNITED STATES MAGISTRATE JUDGE		
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